

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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TRIDENT E&P, LLC,

Plaintiff,

v.

HP INC. AND HPI FEDERAL, LLC,

Defendants.

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Case No. 2:22-cv-03030-WB

**HP INC. AND HPI FEDERAL, LLC’S MOTIONS TO TRANSFER VENUE, MOTION  
TO STRIKE THE COMPLAINT, AND MOTION TO DISMISS THE COMPLAINT**

Defendants, HP Inc. and HPI Federal, LLC, move to transfer this action to the venue of the Northern District of California under FED. R. CIV. P. 12(b)(3) and 28 U.S.C. § 1404(a), consistent with the parties’ forum selection agreement.

In the alternative, Defendants move to strike the Complaint [D.E. 1] in its entirety and move for an award of attorneys’ fees and costs pursuant to CAL. CIV. PROC. CODE § 425.16. In the alternative, Defendants also move to dismiss the Complaint in its entirety for failure to state a claim upon which relief can be granted under FED. R. CIV. P. 12(b)(6). In support of their Motions, Defendants rely upon and incorporate herein by reference the attached Memorandum of Law.

WHEREFORE, Defendants respectfully request that their Motions be granted and that the Court enter the proposed Order transferring the Action or, in the alternative, striking the complaint and awarding attorneys’ fees and costs to Defendant, and dismissing the Complaint entirely and with prejudice.

Respectfully submitted,

Dated: October 3, 2022

/s/ Joseph Kernen

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